

EDWARD H. KUBO, JR. 2499  
United States Attorney  
District of Hawaii

THOMAS MUEHLECK 3591  
Assistant U.S. Attorney  
Room 6100, PJKK Federal Bldg.  
300 Ala Moana Blvd.  
Honolulu, Hawaii 96850  
Telephone: 541-2850  
Facsimile: 541-2958  
[Tom.Muehleck@usdoj.gov](mailto:Tom.Muehleck@usdoj.gov)

Attorneys for Plaintiff  
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	CR. NO. 04-00401-04 HG
	)	
Plaintiff,	)	
	)	JOINT STATEMENT RE: PROGRESS
vs.	)	TOWARDS STIPULATION FOR
	)	EXAMINATION OF DEFENDANT AT
MARY H. VANDERVELDE, (04),	)	GOVERNMENT EXPENSE
	)	
	)	Sentencing Date: April 3, 2006
Defendant.	)	Time: 11:00 a.m.
_____	)	Judge: Hon. Helen Gillmor

JOINT STATEMENT RE: PROGRESS TOWARDS STIPULATION  
FOR EXAMINATION OF DEFENDANT AT GOVERNMENT EXPENSE

The parties wish to advise the Court that the parties have had difficulty contacting experts suggested by the Court for the examination of the defendant. Additionally, while the United States has advised the defense that an examination by Dr. Terri Needels would be acceptable to the United States, Dr. Needels is out of town, and out of contact until Monday, February 27, 2006.<sup>1</sup>

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<sup>1</sup> 1. The United States has spoken with Dr. Needels' office.

The United States and the defense are unsure if Dr. Needels would accept this appointment. The defense, on Thursday, suggested four other experts but the undersigned AUSA has no experience with these individuals and cannot enter into a stipulation by Friday, February 24, 2006. The parties need additional time to discuss their positions. Both counsel for the United States and for the defendant believe a stipulation on the issue of examination can be reached with additional time.

Sentencing hearing date for the defendant is set for April 3, 2006 at 11:00 a.m. before Chief United States District Judge Helen Gillmor.

DATED: February 24, 2006, Honolulu, Hawaii.

EDWARD H. KUBO, JR.  
United States Attorney  
District of Hawaii

By /s/ Thomas Muehleck  
THOMAS MUEHLECK  
Assistant U.S. Attorney

/s/ Thomas Muehleck  
JACK SCHWEIGERT  
Attorney for defendant  
Mary H. Vandervelde